

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

UNITED STATES OF AMERICA,	)	CRIMINAL NO.: 2:16-cr-378
	)	
Plaintiff,	)	
	)	
-versus-	)	<b>MOTION IN LIMINE TO PROHIBIT ANY REFERENCE TO THE TRUTHFULNESS OF A UNITED STATES WITNESS BY THE PROSECUTION</b>
	)	
MICHAEL THOMAS SLAGER,	)	
	)	
Defendant.	)	
_____	)	

Michael Thomas Slager (“Slager”) requests that this Court prohibit the Department of Justice from advising the trial jury in any manner whatsoever that a witness is testifying truthfully or to suggest in any manner whatsoever that the truthfulness or accuracy of said witness has been or will be independently verified by the Department of Justice. This Motion is based upon the following grounds:

1. That such statements are totally improper and invade the province of the jury to determine the credibility of witnesses and constitutes an improper bolstering of said witness without benefit of confrontation for cross-examination as guaranteed by the United States Constitution.
  
2. That it is improper and unethical under the Code of Professional Responsibility for an attorney to argue to a jury that he/she personally believes that a witness is telling

the truth. Rule 3.4(e) of the South Carolina Rules of Professional Conduct, Rule 407  
SCACR.

Respectfully Submitted,

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